

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:	
Beth A. Henson	Case No.: 23-12719-MMH
<i>Debtor</i>	Chapter 11
In re:	
Cynthia A. Warren	Case No. 23-13194 MMH
<i>Debtor</i>	Chapter 11
	Jointly Administered Under
	Case No.: 23-13194-MMH
Beth A. Henson and Cynthia A. Warren	
<i>Movants</i>	
v.	
James M. Peppe, <i>et al.</i>	
<i>Respondents</i>	

**MOTION TO SHORTEN TIME TO RESPOND TO DEBTORS' AMENDED
MOTION FOR RELIEF FROM THE AUTOMATIC STAY
TO PURSUE LEGAL MALPRACTICE CLAIM,
NUNC PRO TUNC AS APPLICABLE TO MAY 30, 2024**

Debtors and Debtors-in-possession, Beth A. Henson (“Henson”) and Cynthia A. Warren (“Warren”, Henson and Warren are collectively “Debtors”), by and through their respective undersigned counsel Eric S. Steiner and Marc A. Ominsky, requests that this Honorable Court grant an Order shortening time to respond to Debtors' Amended Motion for Relief From the Automatic Stay to Pursue Legal Malpractice Claim, Nunc Pro Tunc as Applicable to May 30, 2024 (the "Motion"), and in support thereof, state:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, 11 U.S.C. §§ 105. Venue lies properly in this Court, pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157.

2. All defined terms shall have the meaning as set forth in the underlying Motion.

1. On April 20, 2023 (the “Henson Petition Date”), Henson filed a voluntary petition (the “Petition”) for bankruptcy under 11 U.S.C. Title 11 (the “Bankruptcy Code”).

2. On May 8, 2023 (the “Warren Petition Date”), Warren filed a voluntary petition under Chapter 11 of the Bankruptcy Code, commencing in this Court in Case No 23-13194.

3. This Court entered an order for joint administration of these cases on March 27, 2024. ECF No.: 81.

3. On May 30, 2024, the Debtors inadvertently filed a Complaint against the Respondents without this Court having ordered that the automatic stay be lifted.

4. Having realized this post- State court filing, the Debtors have not taken any additional steps to prosecute the State court action, and therefore have not served the Complaint.

5. The clerk of the State court issued summonses against both Respondents, copies of which are attached hereto as composite **Exhibit 1**.

6. The summonses expire 60 days after their insurance, which date is July 29, 2024.
Id.

7. The Debtors wish to renew the summonses so that the State court action is not dismissed.

8. No creditor will be prejudiced by the Motion since all parties will have had proper service and time to file an Objection.

WHEREFORE, Debtors and Debtors-in-possession, Beth A. Henson and Cynthia A. Warren respectfully request that this Court enter an Order:

1. Granting the Motion;
2. Shortening the time to respond to the Motion on or before July 29, 2024;
3. If necessary, setting this matter for an expedited hearing; and
4. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

> /s/ Marc A. Ominsky

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> /s/ Eric S. Steiner

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Counsel for Debtor Henson

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I HEREBY CERTIFY that on this 25th day of July, 2024, I reviewed the CM/ECF website, and a copy of the Motion was served electronically via the Court's CM/ECF system to:

Hugh Bernstein
U.S. Trustee

Nancy Alper
Counsel for the District of Columbia

Marc A. Ominsky
Counsel for Cynthia A. Warren

I FURTHER CERTIFY that on this 25th day of July, 2024, a copy of the Motion was sent via first-class mail to the parties below and/or to the all creditors and parties listed on the attached joint matrix:

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/s/ Eric S. Steiner
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